

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

ORDER GRANTING FOUR HUNDRED NINETY-EIGHTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE  
LITIGATION CLAIMS

Upon the *Four Hundred Ninety-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Litigation Claims* [ECF No. 21755] (the “Four

<sup>1</sup> The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

Hundred Ninety-Eighth Omnibus Objection")<sup>2</sup> filed by the Commonwealth of Puerto Rico (the "Commonwealth") and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS," and together with the Commonwealth, the "Debtors"), dated August 5, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Ninety-Eighth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Ninety-Eighth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Four Hundred Ninety-Eighth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled "Claims to be Disallowed" in Exhibit A to the Four Hundred Ninety-Eighth Omnibus Objection (collectively, the "Claims to Be Disallowed") having been found to be duplicative of the Litigation Master Claims, as defined in the Four Hundred Ninety-Eighth Omnibus Objection; and the Court having determined that the relief sought in the Four Hundred Ninety-Eighth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Ninety-Eighth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Ninety-Eighth Omnibus Objection is GRANTED as set forth herein; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Ninety-Eighth Omnibus Objection.

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Litigation Master Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21755 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Ninety-Eighth Omnibus Objection**

## Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	APONTE CALDERON, ISABEL M URB EL ROSARIO T13 CALLE G VEGA BAJA, PR 00693	05/30/18	17 BK 03283-LTS Commonwealth of Puerto Rico	25052	Undetermined*	MADELINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072	\$8,990,000.00*

Reason: This claim is duplicative of Master Claim nos. 32044 and 103072, which were filed on behalf of all plaintiffs in the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (the "Acevedo Camacho Master Claims"), by the attorney representing plaintiffs in that litigation. The Acevedo Camacho Master Claims are filed on behalf of the DOFA employees who alleged that DOFA illegally sequestered wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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2 BENIQUEZ RIOS, MARIA DEL C HC 67 BOX 126 BAYAMON, PR 00956	06/28/18	17 BK 03283-LTS Commonwealth of Puerto Rico	162130	Undetermined*	MADELINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072	\$8,990,000.00*

Reason: This claim is duplicative of Master Claim nos. 32044 and 103072, which were filed on behalf of all plaintiffs in the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (the "Acevedo Camacho Master Claims"), by the attorney representing plaintiffs in that litigation. The Acevedo Camacho Master Claims are filed on behalf of the DOFA employees who alleged that DOFA illegally sequestered wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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3 CLEMENTE TAPIA, MARGARITA HC 3 BOX 22922 RIO GRANDE, PR 00745-8868	04/30/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	9837	\$32,000.00*	JEANNETTE ABRAMS-DIAZ ET AL (1084 PLAINTIFFS) COLLECTIVELY (THE "ABRAMS-DIAZ PLAINTIFF GROUP") CIVIL CASE NUM. K AC2005-5021 ABRAMS-DIAZ PLAINTIFF GROUP (1,084 PLAINTIFFS) LCDA IVONNE GONZALEZ-MORALES P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	104127	\$6,829,644.40*

Reason: This claim is duplicative of Master Claim nos. 50221 and 104127, which were filed on behalf of all plaintiffs in the litigation captioned Jeannete Abrams Diaz et al. v. Department of Transportation & Public Works, No. KAC2005-5021 (the "Abrams Diaz Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Transportation and Public Works ("DOTP") employees who alleged that DOTP improperly withheld a proportion of their wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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4 CRUZ ACEVEDO, MARIBEL URB MONTEMAR #13 AGUADA, PR 00602	05/30/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	39412	Undetermined*	FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199	\$15,283,000.00*

Reason: This claim is duplicative of Master Claim nos. 179140 and 93199, which were filed on behalf of all plaintiffs in the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, No. KAC2009-0809 (the "Beltrán Cintrón Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Family Affairs ("DOFA") employees who alleged that DOFA withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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5 ESQUILIN CINTRON, ROSA URB VALLE ARRIBA HEIGHTS BC5 CALLE YAGRUMO CAROLINA, PR 00983	05/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	43713	Undetermined*	FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199	\$15,283,000.00*

Reason: This claim is duplicative of Master Claim nos. 179140 and 93199, which were filed on behalf of all plaintiffs in the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, No. KAC2009-0809 (the "Beltrán Cintrón Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Family Affairs ("DOFA") employees who alleged that DOFA withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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6 MALDONADO FONTANEZ, MARITZA PO BOX 965 COROZAL, PR 00783	06/07/18	17 BK 03283-LTS Commonwealth of Puerto Rico	80639	Undetermined*	MADELINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072	\$8,990,000.00*

Reason: This claim is duplicative of Master Claim nos. 32044 and 103072, which were filed on behalf of all plaintiffs in the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (the "Acevedo Camacho Master Claims"), by the attorney representing plaintiffs in that litigation. The Acevedo Camacho Master Claims are filed on behalf of the DOFA employees who alleged that DOFA illegally sequestered wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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7 ORTIZ RIVERA, WILMA P.O. BOX 5026 CAGUAS, PR 00726-5026	05/21/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	28763	\$230,400.00*	FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199	\$15,283,000.00*

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					MADELINE ACEVEDO CAMANCHO ET AL. (2818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 LCDA. IVONNE GONZALEZ MORALES PO BOX 9021828 SAN JUAN, PR 00902-1828	06/04/18	17 BK 03283-LTS Commonwealth of Puerto Rico	32044	\$50,000,000.00*
					FRANCISCO BELTRAN ET ALL (4,493 PLAINTIFFS) COLLECTIVELY (THE BELTRAN CINTRON PLAINTIFF GROUP")... ATTN: IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902	03/05/21	17 BK 03283-LTS Commonwealth of Puerto Rico	179140	\$105,000,000.00*

Reason: This claim is duplicative of Master Claim nos. 179140 and 93199, which were filed on behalf of all plaintiffs in the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, No. KAC2009-0809 (the "Beltrán Cintrón Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Family Affairs ("DOFA") employees who alleged that DOFA withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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8 REYES ORTIZ, SONIA I TURABO GARDENS 2DA SECCION K 56 CALLE 28 CAGUAS, PR 00727	05/25/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	32116	Undetermined*	FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199	\$15,283,000.00*

Reason: This claim is duplicative of Master Claim nos. 179140 and 93199, which were filed on behalf of all plaintiffs in the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, No. KAC2009-0809 (the "Beltrán Cintrón Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Family Affairs ("DOFA") employees who alleged that DOFA withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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9 RODRIGUEZ MERCADO, IVETTE NUM 5288 CALLE IGENIO URBANIZACION HACIENDA LA MATILDE PONCE, PR 00728-2430	05/17/18	17 BK 03283-LTS Commonwealth of Puerto Rico	26432	\$21,888.86*	JEANNETTE ABRAMS-DIAZ ET AL (1084 PLAINTIFFS) COLLECTIVELY (THE "ABRAMS-DIAZ PLAINTIFF GROUP") CIVIL CASE NUM. K AC2005-5021 ABRAMS-DIAZ PLAINTIFF GROUP (1,084 PLAINTIFFS) LCDA IVONNE GONZALEZ-MORALES P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	104127	\$6,829,644.40*

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10 SALVA RODRIGUEZ (FALLECIDO), CANDIDO A DOS PINOS TOWNHOUSES B 12 CALLE 2 SAN JUAN, PR 00923	05/24/18	17 BK 03283-LTS Commonwealth of Puerto Rico	26248	Undetermined*	MADELINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072	\$8,990,000.00*

Reason: This claim is duplicative of Master Claim nos. 32044 and 103072, which were filed on behalf of all plaintiffs in the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (the "Acevedo Camacho Master Claims"), by the attorney representing plaintiffs in that litigation. The Acevedo Camacho Master Claims are filed on behalf of the DOFA employees who alleged that DOFA illegally sequestered wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

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11 SANTIAGO CONDE, BLANCA PO BOX 370038 CAYEY, PR 00737-0038	06/28/18	17 BK 03283-LTS Commonwealth of Puerto Rico	61367	Undetermined*	MADELINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072	\$8,990,000.00*

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12 VAZQUEZ REYES, KARIAM S URB. ALTAGRACIA CALLE RUISENOR IN-3 TOA BAJA, PR 00949	04/16/18	17 BK 03283-LTS Commonwealth of Puerto Rico	7401	Undetermined*	FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199	\$15,283,000.00*

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